

1 UNITED STATES DISTRICT COURT  
2 FOR THE DISTRICT OF SOUTH CAROLINA  
3 FLORENCE DIVISION

4 CHERYL H. POWELL,  
5 Plaintiff,

6 vs Case No.: 4:08-cv-2482-RBH-TER  
7 NAN YA PLASTICS AMERICA,  
8 Defendant.

9 D E P O S I T I O N

10 WITNESS: CHRISTIAN JAMES MANN

11 DATE: Thursday, April 16, 2009

12 TIME: 2:50 p.m.

13 LOCATION: Law Offices of  
14 Cromer & Mabry  
15 300 Candi Lane  
Columbia, South Carolina

16 TAKEN BY: Attorneys for the Plaintiff

17 REPORTED BY: GINA M. SMITH  
18 Certified Shorthand Reporter  
Registered Professional Reporter

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23 Gina M. Smith, CSR, RPR  
24 117 Harmon Creek Court  
Lexington, SC 29072  
25 803-359-5705

1 Q. What happened to your notes?

2 A. They were formed into the memo of record.

3 Q. And so the notes themselves were destroyed  
4 or tossed out?

5 A. Yes.

6 Q. And did you -- I think there's a document  
7 that you -- and I think you may have written it  
8 first and then it was --

9 A. We both had a --

10 Q. And tell me what -- just generally what  
11 you recall about what Ms. Powell said during that  
12 meeting just based on your memory.

13 A. Okay. She basically talked about, you  
14 know, I guess unprofessional comments that was  
15 going on in the office of QC II, side two.

16 Q. And were these comments about getting  
17 under the boss' desk, things like that?

18 A. Yeah, something like that.

19 MR. MABRY: What I'd like to do if we  
20 could -- there's two ways to do it, Mr. Pearson,  
21 and that would -- really all I want to mark is the  
22 memo, and I only have it -- it's Bates stamped  
23 pages 45, 46, and 47, and it's of Exhibit 2 to  
24 Stevenson's deposition. We can just -- maybe we  
25 can take those three pages out and make it